

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

ZEVE BAUMGARTEN, individually on
behalf of himself and all others similarly
situated and JOHN DOES (1-100) on
behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

CLEANWELL, LLC,

Defendant.

Index No. 1:16-cv-01780-AMD-SMG

**NOTICE OF MOTION AND
MOTION FOR FINAL APPROVAL
OF SETTLEMENT,
CERTIFICATION OF
SETTLEMENT CLASS, AND
AWARD OF ATTORNEYS FEES,
EXPENSES, AND SERVICE
AWARD**

NOTICE OF MOTION

TO: THE COURT, ALL INTERESTED PARTIES AND THEIR ATTORNEYS OF
RECORD:

NOTICE IS HEREBY GIVEN that on a date and time to be determined by the Court, in Courtroom 4GN located at 225 Cadman Plaza, Room 4GN, Brooklyn, New York, Plaintiff Zeve Baumgarten will, and hereby does, move this Court for a final order approving the parties' proposed class action settlement, certifying the proposed settlement class under Rule 23(b)(2), and approving plaintiffs counsels' award of fees and expenses.

In support of this Motion, Plaintiff relies on this Notice of Motion and Motion, his Memorandum of Points and Authorities, the Declaration of Jason Sultzer, the Declaration of Adam Gonnelli, the Declaration of Zeve Baumgarten, the complete court file in this action, and such other matters as may be presented to the Court at the hearing or before the hearing.

Date: September 29, 2017

THE SULTZER LAW GROUP P.C.

By: /s/ Adam Gonnelli

Jason P. Sultzer, Esq. (Bar ID # JS4546)

Joseph Lipari, Esq. (Bar ID # JL3194)

Adam Gonnelli (Bar ID # AG4782)

14 Wall Street, 20th Floor

New York, NY 10005

Tel: (212) 618-1938

Fax: (888) 749-7747

Gonnellia@thesultzerlawgroup.com

LEEDS BROWN LAW, P.C.

Jeffrey Brown, Esq.

Lenard Leeds, Esq.

One Old Country Road, Suite 347

Carle Place, NY 11514-1851

Tel: (516) 873-9550

jbrown@leedsbrownlaw.com

Attorneys for Plaintiff and the Class